

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ANTHONY LEO,	)	
	)	
	)	
Petitioner,	)	
	)	
v.	)	Civil Action No. 04-11006-JLT
	)	
COMMONWEALTH OF	)	
MASSACHUSETTS,	)	
	)	
Respondent.	)	
	)	

**MOTION FOR ENLARGEMENT OF TIME  
TO FILE OPPOSITION TO MOTION FOR BAIL  
AND MOTION TO STAY STATE COURT PROCEEDINGS**

The respondent hereby respectfully requests that this Court grant the Commonwealth an enlargement of time within which it must file an opposition to the petitioner's motion for bail and motion to stay state court proceedings for a period of three (3) business days, up to and including December 8, 2004. In support of the motion, the respondent states that the petitioner's motions were served on November 19, 2004, and therefore an opposition is currently due to be filed on December 3, 2004. The petitioner's motions were received by this office on November 22, 2004, which was the Monday before the Thanksgiving holiday. At the time she received the motions, the undersigned had long-standing plans to travel out of town for family obligations over the holiday weekend. In addition, the undersigned was out of state for business reasons on November 30 and December 1, 2004. In light of the timing of the petitioner's motions and the undersigned's travel obligations, the undersigned has been away from the office for a substantial portion of the fourteen-day period which is usually allowed for preparing an opposition to a

motion. The undersigned therefore requires an additional three-day period for preparation of the opposition to the two motions. Granting the additional three (3) business days requested will not cause any prejudice to the petitioner nor will it cause any undue delay in these proceedings.

WHEREFORE, the respondent respectfully requests that this Court grant the Commonwealth until December 8, 2004, to file an opposition to the petitioner's motion for bail and motion to stay the state court proceedings.

Respectfully submitted,

THOMAS F. REILLY  
ATTORNEY GENERAL

/s/ Maura D. McLaughlin  
Maura D. McLaughlin  
Assistant Attorney General  
Criminal Bureau  
One Ashburton Place  
Boston, Massachusetts 02108  
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BBO No. 634923

Dated: December 2, 2004

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the petitioner, Anthony M. Leo, on December 2, 2004, by depositing the copy in the office depository for collection and delivery by first-class mail, postage pre-paid, as follows: Anthony M. Leo, Old Colony Correctional Center, One Administration Road, Bridgewater, Massachusetts, 02324.

/s/ Maura D. McLaughlin  
Maura D. McLaughlin